UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

November 24, 2008

Reply To
Attn Of: ETPA-088 Ref: 07-034-AFS

Responsible Official William Wood, Forest Supervisor,
1206 South Challis Street
Salmon, ID 83467

Dear Mr. Wood:

We have reviewed the Draft Environmental Impact Statement (DEIS) for the **Travel Planning and OHV Route Designation** on the Salmon Challis National Forest (SCNF) in Idaho. Our review of the DEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Section 309 specifically directs the U.S. Environmental Protection Agency (EPA) to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the DEIS prepared for the proposed project considers the expected environmental impacts and the adequacy of the DEIS in meeting procedural and public disclosure requirements of NEPA.

The SCNF proposes travel planning and OHV route designation on 3.1 million acres of National Forest System lands, excluding the Frank Church River of No Return Wilderness Area. The purpose of this action is to designate a system of roads, trails, and areas open for motorized public use that addresses current and anticipated recreation needs, provides a variety of recreation access opportunities, considers management concerns (such as maintenance costs and consistency with adjoining public lands), reduces impacts to forest resources, recognizes reserved or outstanding rights, and reduces conflicts between recreational uses.

EPA commends the SCNF for their efforts to address the many challenges inherent in travel planning and route designation that responds to recreation and resource management demands. We acknowledge that the Travel Management Plan process is a positive step in addressing resource impacts from motorized uses. Of special note are the proposals to decrease the number of stream crossings and route mileage in vulnerable watersheds and within 300 feet of Clean Water Act Section 303(d) listed streams. We also strongly support motorized dispersed camping restrictions on crossing streams and wet meadows.

Based on our review, we have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*") due to our concerns regarding potential impacts to water resources, fisheries, and the expansion of noxious weeds into currently weed free areas.

While we support Alternative 2 - the Revised Proposed Alternative - we recommend the SCNF modify this alternative (specific recommendations are enclosed) to further reduce the risk of adverse impacts to forest resources. Most of our recommendations involve incorporating Alternative 3's route designations in highly vulnerable watersheds and areas with high noxious weed risk. We also believe an aggressive and reliable monitoring and enforcement strategy is a key component of mitigating the risks caused by motorized access to dispersed camping near waterbodies, unauthorized travel, and the road maintenance backlog.

We appreciate this opportunity to comment. If you have questions or would like to discuss our comments in detail, please contact Erik Peterson at (206) 553-6322 or myself at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosure:
Detailed Comments
Summary of EPA Rating Definitions

cc: US EPA Idaho Operations Office

EPA REGION 10 DETAILED COMMENTS
TRAVEL PLANNING AND OHV ROUTE DESIGNATION
SALMON CHALLIS NATIONAL FOREST, IDAHO

Water Resources[1]

We agree with the Forest's conclusion that the interaction between forest roads and water lies at the heart of several key issues surrounding the effects of roads in the environment[2]. All action alternatives result in reduced route density. We support these overall reductions as they are likely to reduce sediment and other adverse impacts to nearby waterbodies.

Although the DEIS presents important information on water quality indicators and past, present and reasonably foreseeable activities for each ranger district, the DEIS does not sufficiently analyze where and how the proposed action will contribute to potentially significant cumulative water resource impacts.

Recommendation

In order to provide clarity on potentially significant cumulative effects we recommend the FEIS incorporate the "cumulative effects impact ratings to water resources for the existing condition and alternatives for each watershed in the analysis area"[3].

Based on the DEIS's identified 303(d) streams, the Hydrologic Effects section and the key indicators for water resources presented in Tables 3-11 through 3-22 we recommend that the FEIS consider selecting the route designations from Alternative 3 for the following HUC5 watersheds: Dry Creek, Hayden Creek, Upper Lemhi River, Middle Big Lost River, Marble Creek, Pine Creek – Salmon River, Middle Panther Creek and Wet Creek.

We are also concerned that the data for the water resources indicators is inconsistently presented. Inconsistencies make a meaningful comparison of the alternatives difficult. In some cases the indicators for environmental consequences seem to be separated by watershed (e.g. the Sawmill Creek watershed – described below) and in other cases the indicators for environmental consequences to water resources are separated both by watershed and by ranger district (e.g. the Yankee Fork watershed – described below). For the first example, Sawmill Creek watershed, Tables 3-17, 18 and 19 show that Alternative 2 would designate 31.4 route miles. It is unclear whether those 31.4 miles are (i) 31.4 miles on the portion of the Sawmill Creek Watershed contained on each of three ranger districts (if so, this would be inconsistent with Maps CY-2 and LD-2), or (ii) 31.4 miles on the Sawmill Creek Watershed as a whole, most or all of which would be on the Lost River Ranger District (Map LR-2). We conclude, therefore, that the 31.4 miles referred to for three ranger districts is not separated by district but represents the total route miles in the Sawmill Creek watershed.

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[1] Note that our review of the DEIS for Water Resources relates to the corrected Water Resources section 3.3 from the DEIS - Errata available on the World Wide Web at http://www.fs.fed.us/r4/sc/recreation/Travel%20Plan/travel_plan_deis/deis_errata.pdf done on the

[2] DEIS – Errata, p. 17-18

[3] See the DEIS – Errata, p. 39

However, the indicators presented for the Yankee Fork watershed do not follow the same logic as those presented for the Sawmill Creek watershed. In the case of the Yankee Fork watershed, Tables 3-11 and 14 show that there are currently 70.8 route miles in vulnerable subwatersheds. Table 3-17 shows that in the portion of the Yankee Fork watershed partially contained in the North Fork Ranger District, those 70.8 route miles are reduced to 48.4 route miles for Alternative 2. If we assume route designations are presented by watershed and not by district (as in Tables 3-11 and 14) we would expect to see 48.4 route miles in vulnerable watersheds for Alternative 2 in Table 3-20. Instead, Table 3-20 shows that Alternative 2 proposes zero route miles in the portion of the Yankee Fork watershed partially contained in the Middle Fork Ranger district (consistent with Map MF-2). This inconsistency, as stated above, makes meaningful analysis difficult.

Recommendation

We recommend that the FEIS present data for the four water resources indicators consistently, either separated by district and watershed (e.g. Yankee Fork watershed) or by watershed (e.g. Sawmill Creek watershed).

We are also concerned that the environmental consequences discussions for water resources contain errors that make meaningful comparisons between alternatives difficult. For example, there is an apparent error on page 3-32 of the DEIS Errata, "Alternative 3, if selected, would have 336 fewer motorized stream crossings than Alternative 1. Of the action alternatives, Alternative 1 would have the most crossings with 338 stream crossings." This statement implies that Alternative 3 proposes only two stream crossings on the North Fork Ranger District. This seems unlikely when Table 2-21 of the DEIS shows 1,085 stream crossings under Alternative 3 for the North Fork Ranger District.

The inconsistencies described above concern only two of four indicators and three of over 60 watersheds across six ranger districts. Similar issues complicate the analysis of other indicators and watersheds as well. Clarity and consistency is needed to improve readability and aid decision making.

Recommendation

We recommend that the discussion of environmental consequences for water resources by ranger district be consistent with information in the Tables and include explicit references to them.

Fisheries

We commend SCNF for the land management standards and guidelines that have been implemented over the past 15-20 years to improve aquatic habitats. We are concerned that the DEIS does not sufficiently analyze whether or not the standards and guidelines referenced have resulted in improving trends for listed endangered, threatened and sensitive fish. The DEIS states that, "on-forest aquatic habitats should be in an improving trend"[4]. We believe that increased supporting evidence for this conclusion would improve the FEIS's analysis of the proposed alternatives' potential impacts.

[4] DEIS, p. 3-97

Recommendation

We recommend that the FEIS include a more robust analysis of whether or not the on-forest endangered, threatened and sensitive fish species are currently experiencing - and would likely continue to experience under the No Action Alternative - a downward trend. This analysis should consider how future species specific recovery plans might effect route designations.

The analysis of the potential impacts to fisheries does not sufficiently provide a clear basis for choice among alternatives 1-4. Table 2-23 compares impacts to listed fish species for all action alternatives. However, Section 3.5.5 does not discuss the analysis which led to these useful comparisons.

Recommendation

We believe that a qualitative discussion on how the indicators for each alternative in Table 3-35 lead to the comparisons summarized in Table 2-23 would improve the FEIS's analysis of the proposed alternatives' potential impacts.

EPA also recommends that the FEIS describe the species distribution and critical habitat for each threatened, endangered or sensitive on-forest fish species as well as discuss how different alternatives impact critical habitat or species strongholds. We believe the above described, or similar, elements should be incorporated into the Geographic Information Systems (GIS) fisheries layer that the SCNF is currently developing.

Noxious Weeds

Due to the long distances traveled, soil disturbance, and the ability of weed seeds to attach to wheels, tires, undercarriages, riders' pants and boots etc., motorized vehicle use is the primary cause of noxious weed dispersal and infestation. Alternative 2 would designate 45 new routes. The likelihood of these new routes leading to the expanded establishment of noxious weeds into currently weed-free areas is high[5]. The Salmon-Cobalt, Leadore, and North Fork Ranger districts have the greatest noxious weed risk due to those districts having the most motorized routes (in each alternative) and also the most noxious weed infested areas[6].

We appreciate that not authorizing off-road motorized travel will reduce the potential spread of noxious weeds by greatly reducing site disturbance caused by motorized vehicles. We also support the Forest's Integrated Pest Management approach for noxious weeds governed by the SCNF Noxious Weed Management Program FEIS.

Recommendation

In order to lessen the adverse impacts of noxious weeds we recommend selecting the route designation combinations from Alternative 3 for any HUC5 or HUC6 watershed with a "Very High" noxious weed risk rating.

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[5] DEIS, p. 3-119
[6] DEIS, p. 3-115

Monitoring and Enforcement

EPA believes that monitoring and enforcement are crucial for effective wildlife protection, vegetation management, and erosion control. While we recognize the monitoring and evaluation described on pages 2-7 and 2-8 of the DEIS, we believe the public and decision makers would benefit from more specific information on funding, monitoring and enforcement criteria, thresholds, and priorities.

We are also concerned that the monitoring programs for different resources are described throughout the document but not combined into a comprehensive monitoring and enforcement strategy. Sage Grouse, for instance, is described on page 3-142 but not in the "Wildlife" sub-section for monitoring on page 2-8. Instead the "Wildlife" sub-section for monitoring only lists monitoring for the effectiveness of closures where elk habitat security is a concern. While we support elk habitat security monitoring, we believe that it would be helpful to combine all of the monitoring and enforcement activities into a comprehensive strategy. We recommend that the FEIS describe this strategy in one section. Such an approach could lead to more effective monitoring and enforcement.

Recommendations:

We recommend development of a detailed Travel Management Plan Monitoring and Enforcement Strategy. Such a strategy should include specific information on monitoring and enforcement decision thresholds, program priorities, focus areas (e.g. issues and specific locations), personnel needs, costs, and funding sources. We recommend the FEIS demonstrate that the proposed monitoring and enforcement strategy is adequate to assure that motorized vehicle use will not violate access restrictions or exacerbate already identified road-related resource problems. We recommend the Travel Management Plan Monitoring and Enforcement Strategy be annually or biennially updated.

Road Maintenance Backlog

According to the 2003 SCNF *Roads Analysis Report*[7] deferred (backlog) maintenance was estimated at 60 million dollars to correct existing deficiencies over all maintenance levels. Since the period included in the estimate, the forest has experienced both a decline in road maintenance budget and significant increases in operating cost due primarily to large increases in the costs of fuel and materials[8]. We understand that the travel planning process is not intended to correct funding problems and we commend the SCNF for recognizing that limited maintenance funding can impact the sustainability of designated uses.

We are concerned that keeping roads at the low end of the assigned maintenance level may increase the risk of unexpected water quality impacts from the degradation and failure of bridges, culverts, stream crossings and road prisms. We believe that the current travel planning and OHV route designation process is an appropriate time to minimize risks from limited road maintenance funding[9].

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[7] Beke et. al

[8] DEIS, p. 3-202

[9] Our focus on funding is consistent with the Challis National Forest Land and Resource Management Plan (LRMP) as quoted in the DEIS on p. 1-13 and the Salmon National Forest LRMP as quoted on p. 1-8.

Recommendations:

To minimize the risks from limited road maintenance funding we recommend reducing the open road system, increasing the proportion of routes with seasonal restrictions, and/or changing the types of vehicles that may use routes[10]. We especially recommend that the FEIS consider increasing the proportion of ML (Maintenance Level) - 2 Seasonal roads. ML-2 Seasonal roads cost significantly less per year to maintain than ML-2 year round roads. We also recommend that the FEIS analyze the resource impacts and cost savings of changing ML-3 roads to ML-2.

Dispersed Camping

EPA believes that motorized dispersed camping has the potential to cause relatively high and concentrated adverse environmental impacts. Motorized dispersed camping has relatively high environmental impacts because of the soil and vegetation disturbance caused by long traveling, heavy and powerful wheeled vehicles. Impacts are generally concentrated around streams, lakes and other areas of special interest for forest users. We are concerned that Alternative 2 insufficiently addresses these potential motorized dispersed camping impacts.

Recommendations

We support Alternative 2's restrictions against crossing streams and wet meadows and on motorized access within 30 feet of streams. We recommend adding to these restrictions the following elements from Alternative 3: restrict motorized access for dispersed camping within 300 feet of perennial streams, 150 feet of lakes, and 100 feet of intermittent streams, except along the Salmon River Road[11]. We believe these additional restrictions would lessen sediment delivery to streams – an important threat to fisheries[12] – by limiting route treads that become drainage pathways near waterbodies.

EPA prefers the establishment of pull-outs (Alternatives 2 and 3) to a 300 foot dispersed camping zone along Salmon River Road (Alternatives 1 and 4). In order to increase public understanding and enforceability of this selection we recommend the FEIS include assurances that SCNF will install signs at each of the pull-outs. These signs should clearly delineate the dispersed camping area and related restrictions.

Unauthorized Travel

Across the SCNF there are 1,115 miles of known unauthorized routes in areas open to cross-country motorized travel and 1,598 miles of known unauthorized routes in "restricted areas", which are violations of current travel plans[13]. Unauthorized routes have a high potential risk to forest resources because they have been established without consideration of the Forest's route construction BMPs or NEPA analysis.

We are concerned that the DEIS insufficiently analyzes the potential impacts of converting unauthorized routes to motorized routes. We are especially concerned that the 59

[10] DEIS, p. 3-202
[11] DEIS, p. 3-197
[12] DEIS, p. 3-98
[13] DEIS, p. 3-6

miles on the Leadore and 96 miles Lost River Ranger Districts have a high potential for impacts to water resources. According to Table 3-9 these districts have relatively large proportions of high vulnerability subwatersheds as well as low geomorphic integrity and low water quality integrity.

We believe the DEIS does not sufficiently describe the enforcement that will ensure closures are effective. We understand that this concern is already decided by law and that the Travel Management Rule will not increase the agency's budget or the number of law enforcement officers. However, we believe the current travel management planning process provides an opportunity to include the enforceability of route designations as a decision criterion.

Recommendations

We recommend that the FEIS analyze (i) any unique risks from converting unauthorized routes to motorized routes and (ii) the resource benefits of selecting Alternative 3's combination of converted unauthorized routes on the Leadore and Lost River Ranger Districts. We also recommend that the FEIS describe how enforceability was included as a criterion in the travel planning process.

EPA believes that education and cooperative partnerships support enforcement by promoting voluntary compliance. We recommend that the FEIS list current cooperative relationships related to preventing unauthorized use and discuss how benefits from these relationships could be increased in the future.

Air Quality

EPA is concerned that the DEIS does not analyze air quality. An unregulated two-stroke off-highway motorcycle can emit as much pollution in one hour as over 20 automobiles operating for one hour. A four-stroke ATV can emit as much pollution as five automobiles[14]. A relatively high proportion of the air pollution from off-highway motorized vehicles, especially from two-stroke engines, includes polyaromatic hydrocarbons – the most toxic component of petroleum products. Risks from this pollution are of particular concern in valleys that have frequent inversion conditions and periods of poor air dispersion.

Recommendation:

We recommend the FEIS analyze potential human health and wildlife impacts from the hazardous air pollutants produced by off-highway motorized vehicles in mountain valleys subject to frequent inversion conditions.

Over Snow Recreation

We recognize that the SCNF has chosen to not include over snow vehicles in this travel planning, but we note that the general direction from the SCNF LRMP directs that road use be managed by seasonal closure if, "Use causes unacceptable damage to soil and water resources due to weather or seasonal conditions"[15]. EPA believes that over snow recreation by both wheeled and tracked motor vehicles can potentially cause damage to soil and water resources due to weather and seasonal conditions.

[14] http://www.epa.gov/otaq/regs/nonroad/2002/f02033.pdf
[15] DEIS, p. 1-7

This damage can be caused by the delayed melting of snow that has been compacted by motor vehicle recreation in the winter and spring - delayed melting causes muddy conditions to persist into the late spring and summer OHV season. The persistence of muddy conditions increases rutting of native surfaced roads and trails. Ruts channel runoff and channeled water can increase soil erosion and sediment delivery to streams. Also, fragile alpine environments and sensitive plants are easily disturbed when snow cover is thin and/or inconsistent.

Recommendations

Due to the cumulative and potentially destructive nature of impacts from over the snow recreation we recommend that motorized spring and wintertime use be considered together with motorized use in other seasons. The Motorized Vehicle Use (MVU) map(s) should provide conditions, if any, for over snow recreation. We recommend that the Forest Service consider protecting vulnerable alpine vegetation with restrictions on motorized use when the snow is less than one foot deep.

U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987